# EXHIBIT 4

## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

LG.PHILIPS LCD CO., LTD.,

Plaintiff,

٧. TATUNG CO.; TATUNG COMPANY OF AMERICA, INC.; AND VIEWSONIC CORPORATION

Defendants.

CIVIL ACTION NO. 04-343

# **DEFENDANT VIEWSONIC CORPORATION'S FOURTH SET OF** INTERROGATORIES TO PLAINTIFF LG. PHILIPS LCD CO., LTD.

Pursuant to Rule 33 of the Federal Rule of Civil Procedure, Defendant ViewSonic Corporation requests that Plaintiff LG. Philips LCD Co., Ltd. respond to the following Interrogatories, separately and fully, under oath and in writing. The response shall be signed by the person making said response and served upon Plaintiff within 30 days after service of these Interrogatories.

#### **DEFINITIONS AND INSTRUCTIONS** I.

ViewSonic incorporates the definitions and instructions in its previous Interrogatories.

#### П. **INTERROGATORIES**

### **INTERROGATORY NO. 35:**

State all details regarding the circumstances for and creation of the documents identified below that have been produced in this case with the indicated Bates numbers, including but not limited to the identity of every person involved in the preparation of the documents, the date(s) the documents were prepared, the reasons the documents were prepared, the purposes of the documents, any meetings relating to the documents, the identity of all people, entities and/or

third parties LPL expected or intended would receive and/or review the documents, and the identity of all people, entities and/or third parties who received the documents:

LPL-01564 to LPL-01572; LPL-01581 to LPL-01589; LPL 12002 to LPL 12003; VS024391 to VS024423; VS024424 to VS024458; and

VS024459 to VS024487.

### **INTERROGATORY NO. 36:**

Identify each product by model number and/or other designation made, sold, offered for sale, demonstrated or used by or on behalf of LPL on or after January 1, 1998 that incorporates or embodies a flat panel display device (e.g., an LCD module, plasma display panel or field emission device) that can be affixed, secured, mounted, or attached to, on, or within any other structure, including but not limited to a frame, chassis, tray, bracket, hinge, hinge arm, enclosure, case, housing, or stand, at or near the corners of the flat panel display device, and state the monthly and annual gross and net sales and resultant gross and net profits for each product, by country and by model number and/or other designation. To the extent it is less burdensome for LPL, it is acceptable for LPL to provide the information requested by country in a form that simply provides the information separated by U.S. and by the rest of the world.

#### **INTERROGATORY NO. 37:**

Identify each product by model number and/or other designation made, sold, offered for sale, demonstrated or used by or on behalf of LPL on or after January 1, 1998 that incorporates or embodies a flat panel display device (e.g., an LCD module, plasma display panel or field emission device) that cannot be affixed, secured, mounted, or attached to, on, or within any other structure, including but not limited to a frame, chassis, tray, bracket, hinge, hinge arm, enclosure, case, housing, or stand, at or near the corners of the flat panel display device, and state the monthly and annual gross and net sales and resultant gross and net profits for each product, by

country and by model number and/or other designation. To the extent it is less burdensome for LPL, it is acceptable, for LPL to provide the information requested by country in a form that simply provides the information separated by U.S. and by the rest of the world.

Date: February 28, 2007

Respectfully submitted,

Connolly Bove Lodge & Hutz LLP

By: /s/ James D. Heisman

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Attorneys for Defendant
ViewSonic Corporation

## **CERTIFICATE OF SERVICE**

I, James D. Heisman, hereby certify that on February 28, 2007, a true copy of the foregoing **DEFENDANT VIEWSONIC CORPORATION'S FOURTH SET OF**INTERROGATORIES TO PLAINTIFF LG. PHILIPS LCD CO., LTD was hand delivered to the following persons and was electronically filed with the Clerk of the Court using CM/ECF which will send notification of such filing to the following and the document is available for viewing and downloading from CM/ECF:

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I hereby certify that on February 28, 2007, I have sent by email and U.S. Mail the foregoing document to the following non-registered participants:

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